

Hearing Date: April 24, 2012 10:00 a.m. (Prevailing Eastern Time)  
Objection Deadline: April 6, 2012 4:00 p.m. (Prevailing Eastern Time)

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*Counsel to Defendants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

TRONOX INCORPORATED, *et al.*,

Debtors.

**TRONOX INCORPORATED, TRONOX  
WORLDWIDE LLC f/k/a Kerr-McGee  
Chemical Worldwide LLC, and TRONOX LLC  
f/k/a Kerr-McGee Chemical LLC,**

**Plaintiffs,**

v.

**ANADARKO PETROLEUM CORPORATION and  
KERR-McGEE CORPORATION, KERR-McGEE  
OIL & GAS CORPORATION, KERR-McGEE  
WORLDWIDE CORPORATION, KERR-McGEE  
INVESTMENT CORPORATION, KERR-McGEE  
CREDIT LLC, KERR-McGEE SHARED  
SERVICES COMPANY LLC, AND KERR-McGEE  
STORED POWER COMPANY LLC**

**Defendants.**

**THE UNITED STATES OF AMERICA,**

**Plaintiff-Intervenor,**

v.

**TRONOX, INC., TRONOX WORLDWIDE LLC,  
TRONOX LLC, KERR-McGEE CORPORATION  
and ANADARKO PETROLEUM CORPORATION,**

**Defendants.**

) Chapter 11

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) Case No. 09-10156 (ALG)

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) Jointly Administered

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) Adv. Pro. No. 09-01198 (ALG)

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PLEASE TAKE NOTICE that upon the accompanying Declaration of Thomas R. Lotterman, and the memorandum of law in support of motion, Defendants Anadarko Petroleum Corporation, Kerr-McGee Corporation, Kerr-McGee Oil & Gas Corporation, Kerr-McGee Worldwide Corporation, Kerr-McGee Investment Corporation, Kerr-McGee Credit LLC, Kerr-McGee Shared Services Company LLC and Kerr-McGee Stored Power Company LLC will move this Court for an order granting Defendants' Motion *In Limine* to Exclude Testimony of the Avoca Witnesses. A hearing will be held before the Honorable Allan L. Gropper, United States Bankruptcy Judge, in Room 617 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **April 24, 2012, 10:00 a.m.** (Prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that any responses or objections to this motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, set forth the legal and factual basis therefor, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, and on (i) the chambers of the Honorable Allan L. Gropper, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil, Gotshal & Manges LLP, attorneys for the Defendants, 767 Fifth Avenue, New York, New York 10153 (Attn: Richard A. Rothman, Esq., and Bruce S. Meyer, Esq.) and 700 Louisiana, Suite 1600, Houston, Texas, 77002 (Attn: Melanie Gray, Esq., Lydia Protopapas, Esq., and Jason W. Billeck, Esq.); (iii) Bingham McCutchen LLP,

attorneys for the Defendants, 355 South Grand Avenue, Suite 4400, 3 Los Angeles, California 90071 (Attn: James J. Dragna, Esq.), and 2020 K Street, NW, Washington, DC 20006 (Attn: Thomas R. Lotterman, Esq. and Duke K. McCall, III, Esq.); (vi) the United States Attorneys Office, 86 Chambers Street, New York, New York 10007 (Attn: Joseph A. Pantoja, Esq.), so as to be filed and received no later than **April 6, 2012, 4:00 p.m.** (Prevailing Eastern Time) (the "Objection Deadline").

Dated: March 16, 2012

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 16, 2012, a true and correct copy of the foregoing was served on the following counsel of record by ECF and/or as indicated below:

**Via email jeffrey.zeiger@kirkland.com and  
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/s/ Thomas R. Lotterman  
Thomas R. Lotterman